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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA GEORGIA 30303-8960

September 30, 2014

Mr. John Richard Lint
Forest Supervisor
Chester County Stream and Riparian
Restoration/Enhancement Project
4931 Broad River Road
Columbia, South Carolina 29212

SUBJECT: Draft Environmental Impact Statement, Chester County Stream and Riparian Restoration/Enhancement Project, Sumter National Forest, Chester County, S.C. CEQ No.: 20140263

Dear Mr. Lint:

The U.S. Environmental Protection Agency (EPA) Region 4 Office has received and reviewed the subject document and is commenting in accordance with Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Draft Environmental Impact Statement (DEIS) proposes to restore and enhance the hydrologic and aquatic functions of approximately 18 miles of streams within four Sumter National Forest watersheds in Chester County, S.C.

The U.S. Forest Service (USFS) evaluated two alternatives, including the No Action alternative. The proposed action alternative includes the primary restoration and enhancement activities of floodplain reconnection, floodplain excavation, floodplain transitions, floodplain benches and planting native trees, shrubs and herbaceous vegetation. EPA notes that the Forest Management Plan will require an amendment for the proposed action. The four (4) streams that would be addressed through this proposed action include Clarks Creek, Little Turkey Creek, McCluney Branch, and an unnamed tributary to Clarks Creek.

The DEIS identifies that timber harvesting will also be conducted as part of the stream restoration and enhancement project. EPA could not identify in the DEIS how much timber is being harvested from soil borrow and stream restoration areas and notes the estimated value for timber in Table 3-31, page 173. EPA requests that this information be provided in the Final EIS. Approximately 13 miles of temporary roads would also be constructed as part of the proposed action. Due to the extent of soil disturbance for this proposed action, the introduction of aggressive non-native invasive species (e.g., Japanese knotweed, Chinese privet, etc.) is a potential long-term concern that should be addressed to meet the project's wildlife habitat enhancement goals. EPA requests that the most stringent Best Management Practices (BMPs) be employed during and after construction activities including periodic monitoring and annual eradication treatments for non-native invasive species, as necessary.

EPA notes the 'mitigation measures' being proposed in Section 2.4 of the DEIS, including erosion and sediment control measures for water quality, aquatic organism reintroduction, rare plant communities and future old growth remnants, proposed, threatened and sensitive species, and scenic and recreation. For water quality impacts associated with the proposed action, the USFS is proposing to minimize soil runoff into streams by strict adherence to numerous soil erosion and sediment control measures, streams would be diverted and pumped around active construction areas when needed to reduce work in flowing water, and repairs for in-channel work may require the use of low ground pressure equipment or mats to access problem areas. The USFS proposes aquatic species re-introduction in at least one project stream immediately following restoration and in the remaining streams if 2 years of monitoring indicates low species diversity and density. Rare plant communities and future old growth remnants are planned to be avoided by the USFS to the extent possible. Measures to minimize potential impacts to the Bald Eagle nests and communal roost sites and Georgia Aster sites are also described in the DEIS. EPA supports these avoidance and minimization measures and requests that they be included as environmental project commitments in the Record of Decision.

Based upon our review of the DEIS, we have rated the document as 'lack objections', or "LO", which indicates that we do not have any substantial environmental concerns for the proposed action as described. Please address the proposed avoidance and minimization measures in the Final EIS. Please forward a copy of the Final EIS for our review and comment when it becomes available. Should you have any questions concerning our review comments, please contact Mr. Christopher Militscher of my staff at 404-562—9512 or by e-mail at Militscher.chris@epa.gov.

Sincerely,

Heinz J. Mueller, Chief NEPA Program Office